



Gideon Orion Oliver
 —ATTORNEY AT LAW—
 He/him/his

277 Broadway, Suite 1501

New York, NY 10007

 1825 Foster Avenue, Suite 1K
 Brooklyn, NY 11230

Office: (718) 783-3682

Signal: (646) 263-3495

Fax: (646) 349-2914*

*Not for service

July 19, 2022

BY ECF

Honorable James R. Cho
 United States District Court
 Eastern District of New York
 225 Cadman Plaza East
 Brooklyn, NY 11201

Re: Jack Norton v. The City of New York, et al., 21-CV-4884 (FB) (JRC)

Your Honor:

I represent Plaintiff in this matter. I write jointly with the Defendants who are represented by the Law Department to ask that the Court adjust the pretrial schedule that the Court set on January 19, 2022. At that January 19, 2022 conference, the Court set a pretrial schedule by which, *inter alia*, there was to be no amendment of the pleadings or joinder of additional parties after April 19, 2022, and the parties were to complete fact discovery by July 19, 2022, and commence dispositive motion practice by August 18, 2022. On March 23, 2022, the Defendants represented by the Law Department moved to stay this matter (ECF No. 31) and, following a motion hearing on April 12, 2022, the Court granted the motion in part and denied the motion in part, staying discovery as to Sgt. Bilal Ates during the pendency of the Civilian Complaint Review Board (“CCRB”) investigation against him. On April 19, 2022, the parties filed a joint status report (ECF No. 32). On May 3, 2022, the Court schedule a telephone status conference in this matter for July 21, 2022 at noon. Although the parties are in the process of exchanging discovery, much of the discovery in the case remains to be conducted. The parties therefore now jointly request that the Court extend the deadlines for joinder of additional parties (*nunc pro tunc*¹), the completion of fact discovery, and the commencement of dispositive motion practice until dates to be determined by the Court at or after the July 21, 2022 telephonic status conference. Thank you for your attention to this matter.

Respectfully submitted,

/S/

Gideon Orion Oliver

¹ The parties previously informed the Court of Plaintiff’s intention to move to adjust this deadline, including in the parties’ joint status report (ECF No. 32).